

Lemon Gulch Trail System Project

Scoping Report

The District Ranger issued a letter dated March 10, 2021 to announce the release of the proposed action. The letter and the proposed action document were distributed via GovDelivery to 419 email recipients and sent postal mail to 107 recipients. The scoping notice requested that comments be returned to the Forest Service by April 15, 2021. A total of 86 responses had been received by that date (see list on page 3).

Comments were categorized by topic or affected resource. A general summary of the sentiment is presented with a few examples of the comments. The full text of all comments is available for review at the Ochoco National Forest office in Prineville, Oregon.

Wildlife Concerns with Proposed Action

Ochoco Trails group submitted a sustainable trails proposal to the Forest Service in 2019, of which the current proposed action was a part. Planning for the sustainable trails proposal incorporated strategies to minimize impacts to fish and wildlife on the larger landscape while balancing public desires for recreation infrastructure, guided by Oregon Department of Fish and Wildlife and Forest Service biologists. However, the Lemon Gulch trail proposal does have potential to impact fish, wildlife, and habitat in the project area. Commenters expressed concern about effects to core habitat patches, big game winter range, and disturbance in general.

- In my experience wildlife will move out of the area.
- This level of activity may effectively drive Deer out of the area to seek more seclusion. Looking at the surrounding area on the maps provided it looks like this area now is an area that could or possibly is used for that purpose by deer, elk and other species of wildlife.
- ODFW recommends placing bridges at Lemon Creek crossings to reduce sedimentation effects on Redband trout.
- ODFW recommends monitoring use of the project area in the context of recreation across the ONF and using current planning guides (provided) in project planning.
- Consider additional road closers and continue to address user-created roads and trails; consider opportunities for using Good Neighbor Authority agreement.
- Recommend using radio collar data on mule deer to help with this proposal.
- Concern for cumulative effects to species sensitive to human disturbance, lack of hiding cover, greater forest density, and multi-layered canopy or shrub layers, such as mule deer, elk, goshawk, and neotropical migratory birds.
- Do not locate trails within goshawk nesting areas or post-fledgling areas. Develop an alternative that avoids all high use or special seasonal use elk and deer areas and all goshawk nest area buffers. Parts of the planned trail system that have high wildlife use or go into areas farther from existing road prisms that are open roads should either be dropped or be designated and designed for hikers only.

Livestock Grazing Concerns with Proposed Action

The Lemon Gulch Trails project area falls within an active livestock grazing allotment within which permitted livestock graze generally from mid-May to the end of June. Commenters expressed concerns about safety and effects to the ability to properly manage livestock.

- There are already many miles of established trail within the watershed and allotment.
- The management allocations emphasize production of timber and forage; permittee use and timber management practices should be prioritized above recreationists.
- It appears that many of the trails are hitting the high points and ridges of the terrain which will ultimately drive cattle off of those grazing areas and pushing livestock to creeks/riparian areas.
- It appears that the system is designed for higher speeds. The safety of the bicyclists and the safety of permittee riders managing cattle would be at risk.
- Wildlife and cattle will use the trails because animals by nature prefer a path of least resistance. Permittees will also be using them if they need to move the cows.
- Consider using existing roadways and/or abandoned roads used in the past for the trail system.
- Safety may be jeopardized and distribution of cattle will be unmanageable. Consider a closure during the grazing period to manage forage resources and adhere to guidelines (through July 1 or when most cattle are moved out of the area).
- The proposed parking area at the top end of the 3360307 road is near Buck Spring which is heavily used by cattle as a water source. Traffic and bikers may displace livestock to the creek bottoms where they would create negative impacts to riparian areas, requiring extra riding to push cattle up the hills. This requires more man days of riding and puts additional stress on the livestock. Consider putting the upper parking spot at the end of the 3360358 and restricting trails to the hillside and ridge east of the 3360 road.

Other recommendations for Analysis, Project Design, or Alternatives

- Prevent sedimentation into the creeks.
- Avoid routing trails through existing invasive plant sites. Educate the public about invasive plants and include prevention measures such as boot brush stations at each parking area.
- I encourage you to work with adjacent landowners to address their concern. In particular it appears that a trail segment would be very near the parcel along the 100/130 road. Consider moving the trailhead from that location.
- Concentrate on shorter loops near the main trailhead for beginners or those with time constraints.
- With all of the radio collars provided by O.H.A. for recording use and routes of Deer I would like to see that information researched and utilized with input from the U.S.F.S. Biologist and O.D.F.W. to help with this proposal to help the Mule Deer population.
- Education of the public should be a main concern in this proposal to encourage multiple-use to enjoy public lands responsibly.
- The trails could meet the needs of the community if it were a loop trail, alleviating the density of trails and reducing safety concerns and disruption.
- There should be clear one-way trails and clear signage for trail users warning of traffic. Specific closures that are inappropriate for some user groups (e.g. equestrians on steep black diamond downhill trail) should be well signed, along with yield signage.
- If the majority of parking will occur at junction of 3360200, should consider having CXT vault toilet available here as well as or instead of 3360100.

- I think this is a great place to allow E-bikes to allow big outer loops easier or pedal up for multiple loops in a day or summer evening. E-bikes allow groups of people with varying physical abilities to ride together.
- Have separate trails marked specifically for hiking instead of the entire system being designated for mountain bike use.
- Consider dropping commercial logging in the mountain bike trails vicinity and leaving hiding cover on either side of the trail.
- Avoid sensitive plant populations.

General Support for the Proposed Action

Most input was received from supporters of the proposal. There has been a demand for this type of trail system in Central Oregon; many commenters expressed their support for the proposal, citing the potential economic benefits, reduction in user conflicts, and excitement to have a new location to ride.

- Downhill specific trails with different degrees of difficulty and a shuttle able road is the type of riding this area is missing. I feel many locals would enjoy this area and it would be a draw for out town riders.
- It will be a popular destination because it's unlike any of the other trail areas in Central Oregon and mountain bikers really enjoy variety of terrain.
- I am pleased to see the needs of people with disabilities addressed with the inclusion of two trails designed for people with disabilities on adaptive mountain bikes.
- Construction of these purpose-built mountain bike trails will benefit equestrians by attracting some of the bike traffic currently on the Lookout and Round Mountain Trails. This will make the multi-use trails safer and more enjoyable for horseback riders and hikers.
- Lemon Gulch is much closer to Prineville than other trails in the Ochocos. This means greater positive economic impact for the community, as well as helping to focus use on this relatively small geographic area.
- Since this has been a collaboration with the Ochoco Trails group, a positive outcome will set a fantastic example of how traditionally adversarial user groups can work together successfully.
- The new trails will attract visitors to Prineville and Crook County, benefitting the local economy. The trails' proximity to Prineville will encourage locals to engage in healthy outdoor recreation.

List of individuals, agencies, and organizations that submitted scoping responses:

Christopher Nauer, Confederated Tribes of the
Warm Springs Indian Reservation
Darlene Henderson, Ochoco Trails
Emmy Andrews, Central Oregon Trail Alliance
Chris Bernhardt, Oregon Mountain Biking Coalition
Sara Gregory, Oregon Dept. of Fish and Wildlife
Crook County Board of Commissioners
Joe Meyers, Bend Trails
Robert Rekward, Bend Trails
Chris Grier

David Olewiler
Kim McCarrel, Oregon Equestrian Trails
Justin Cook
Kestler
Maria Hatcliffe
Matthew Gerlach
Paul Lissette
Rod Adams
Shelley Santucci
Travis holman

Tyler Simons
Aaron Lazelle
Alex Anderson
Amber Toomey
Angela Tye
Benjamin Taber
Bethany McWilliams
Brennan Morrow
Cal Curley
Calvin Lee
Darlene Henderson
David Caplan
David Hudson
Delaney O'Connor
Don Leet
Donna Barnes, Crook Co. on the Move
Dylan Wood
Earl Alderson
Erika Schmid
Gabriel Tiller, Oregon Timber Trail Alliance
Grant Waring
Heather Lynch
Jack Reynolds
Jason Caron
Jeanette Holman
Jonathon Fogarty
Josh Colvin
Josh Owen
Joshua Diep-Anderson
Justin Kureger
Kelly Burke
Kristen Burch
Mark DeJohn
Mark Landers
Mark Nordberg
Mark Seabourne
Matthew Ison
Matt Leonard

May Holzman
Michael Wingertsahn
Mike Schmeiske
Nat Chotechuang
Nick Hudriede
Owen Rodabugh
Pete Fairhurst
Peter Smith
Ray Budrevich
Rob Dorshorst
Robert Hollister
Ron West
Scott Jackson
Stephen Henderson
Steve Holman
Suzanne Marcoe
Thomas Yeoman
Timothy Henke
Trevor Miller
Roy and Mary Beyer
Bethany Holman
Matt Wesley
Kimberly Vogel
Terry Neill
Rodney and Cora Klein
Karen Coulter, BMBP

Peer, Beth- FS

Subject: FW: May 27 Lemon Gulch field meeting with the public

From: Peer, Beth- FS

Sent: Friday, May 28, 2021 10:06 AM

To: Turner, Slater -FS <slater.turner@usda.gov>; Joosen, Christopher -FS <christopher.joosen@usda.gov>; Beaupre, James - FS <james.beaupre@usda.gov>; Sanders, Thomas - FS, PRINEVILLE, OR <Thomas.Sanders@usda.gov>; Kurtz, Tory -FS <tory.kurtz@usda.gov>; Passarelli, Andrew -FS <andrew.passarelli@usda.gov>

Subject: May 27 Lemon Gulch field meeting with the public

This email is intended to document yesterday's ID Team meeting and public meeting in the Lemon Gulch Trails project area.

IDT meeting began at 12:00. Attending from Forest Service: Slater Turner, Chris Joosen, Jim Beaupre, Andrew Passarelli, Garry Sanders, Tory Kurtz, Mikayla Mills, Beth Peer.

Beth recapped status and results of last meeting. Slater reiterated that we want to show how we can balance multiple uses on the Forest. Tory suggested alternative project locations, and the group discussed how the Ochoco Trails process worked in determining the Lemon Gulch location for meeting this kind of recreational need on the Forest.

Public meeting began at 1:00. Attending: Kim McCarrel (Oregon Equestrian Trails, Ochoco Trails), Travis Holman (COTA, Ochoco Trails), Greg Jackle (ODFW), Tim Deboodt (Crook Co. Natural Resources Advisory Committee), Ron and Mary Beyer (grazing permittees), Shelly and Brittany Santucci (grazing permittees), Dan and Kim Vogel (grazing permittees)

Slater told the group that he was interested in listening to concerns and finding workable solutions. Jim and Chris provided a brief background of how Ochoco Trails group had been formed and how the current proposal was developed as part of a forest-wide sustainable trails program. Travis provided some description of the scope of proposal, downhill focus, ability to shuttle, and proximity to town.

We heard general concerns about the nature of the project in relation to the historic use of the Forest for grazing and concerns about how permittees were not informed about the proposal by the Forest Service in advance of the scoping notice. Slater noted our interest in being able to address specific issues with the proposal.

We discussed the importance of managing expectations of the public when recreating in an area of an active cattle allotment (e.g. not expecting perfectly groomed trails during the grazing season). We agreed we would look in to liability question. We discussed wildlife impacts, increased road use, and safety concerns. Tim Deboodt suggested that the project be undertaken in phases, with check-ins following each phase. We will have further discussions about what kind of monitoring/metrics we would look at after each phase.

Permittees provided information relating to the infrastructure that may be in conflict with proposed trail locations (e.g. salting areas, water troughs, springs, gates), and it was determined that it would be best to have them identify these spatially on maps so that we could look at how the proposal could be modified. Chris discussed with Shelly and Ron that we'd like to receive their input by **June 11th**.

Once we have that in hand, we can convene a small group to look at possible modifications to the proposed action or alternatives. We can seek input from subject-matter experts on feasibility of changes so that we don't analyze something that is not implementable.



Beth Peer
Environmental Coordinator

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Ochoco National Forest

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Phone Log

6/22/21	Beth spoke with Nettie Downing who expressed concerns about the project and not having been notified earlier. She expressed concerns about the trail committee not representing the locals. I followed up with an email providing information about how to subscribe to project updates.
6/22/21	Beth spoke with Dave Nielsen and his daughter Marci Wayman about their concerns as property owners on Mill Creek Road. They were told by Vogels that no one contacted the permittees. I shared with them that we have met with the permittees and will be continuing to engage. Mr. Nielsen expressed concerns about increased use of the road and potential for people parking outside of the trailhead and about bikes on the road.
7/15/21	Beth spoke with Nettie Downing who was having trouble finding the project on the web. I gave her the address and listened to many concerns about using the work "community" in relation to the trails coalition, not caring about deer and elk, and what would happen when people abuse the area and how will rules be enforced.

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Comments were categorized by topic or affected resource. A general summary of the sentiment is presented with a few examples of the comments. The full text of all comments is available for review at the Ochoco National Forest office in Prineville, Oregon.

Wildlife Concerns with Proposed Action

Ochoco Trails group submitted a sustainable trails proposal to the Forest Service in 2019, of which the current proposed action was a part. Planning for the sustainable trails proposal incorporated strategies to minimize impacts to fish and wildlife on the larger landscape while balancing public desires for recreation infrastructure, guided by Oregon Department of Fish and Wildlife and Forest Service biologists. However, the Lemon Gulch trail proposal does have potential to impact fish, wildlife, and habitat in the project area. Commenters expressed concern about effects to core habitat patches, big game winter range, and disturbance in general. The following are some representative comments:

- In my experience wildlife will move out of the area. This level of activity may effectively drive Deer out of the area to seek more seclusion. Looking at the surrounding area on the maps provided it looks like this area now is an area that could or possibly is used for that purpose by deer, elk and other species of wildlife.
- ODFW recommends placing bridges at Lemon Creek crossings to reduce sedimentation effects on Redband trout. ODFW recommends monitoring use of the project area in the context of recreation across the ONF and using current planning guides (provided) in project planning.
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meetings took place with permittees during the summer and fall of 2021. The following are just representative comments:

- There are already many miles of established trail within the watershed and allotment.
- The management allocations emphasize production of timber and forage; permittee use and timber management practices should be prioritized above recreationists.
- It appears that many of the trails are hitting the high points and ridges of the terrain which will ultimately drive cattle off of those grazing areas and pushing livestock to creeks/riparian areas.
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Other recommendations from the responses for Analysis, Project Design, or Alternatives

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General Support or Opposition for the Proposed Action

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- The new trails will attract visitors to Prineville and Crook County, benefitting the local economy. The trails' proximity to Prineville will encourage locals to engage in healthy outdoor recreation.

Input was received from members of the public in opposition to the proposal. Some people see the recreational trails as a threat to their way of life. People who have property of live along the county road that accesses the National Forest are concerned that people who visit the Forest to use non-motorized trails will degrade the road, increase the risk of wildfire starts, increase incidence of garbage or other lawlessness. Many of the concerns voicing opposition also fall within the wildlife impact and grazing impact categories represented above. Other representative comments:

- Mountain bikes at this magnitude threatens to change the landscape if not done thoughtfully, with moderation, and in sync with the custom and culture of the surrounding community.
- The Lemon Gulch Trial system project should be stopped; residents received no notification, and it will affect their livelihoods and their enjoyment of their homes.

- The proposed action is excessive and most appropriately placed in a recreation management area as prescribed in the Ochoco Forest Plan.
- Other uses will be pushed out of the area, making it primarily a recreation area.
- Fire is a major concern. How will increased use be managed to prevent fires which increase risk to residents?
- The general public was deprived of their right to provide input.
- The lure of 50+ miles of trail will have a severe impact on the traffic level on Mill Creek Road.
- Invasive weeds are a concern – vehicles and bikes can introduce a host of undesirable invasive plants, including knapweed, toadflax, puncture vine, etc.
- Lemon Creek is a spawning ground for Redband Trout- stream pollution is a concern.
- The local economy impact is probably just marginal.